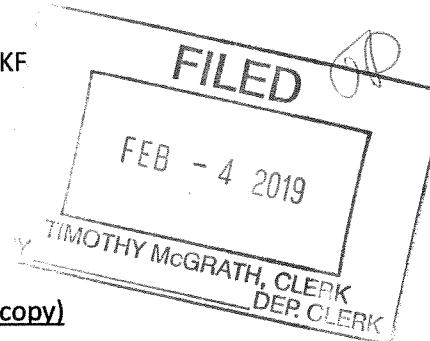


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ALLEN WINDRIM, Pro Se	:	UNITED STATES BANKRUPTCY COURT
Debtor	:	EASTERN DISTRICT OF PENNSYLVANIA
	:	
	:	
	:	Bankruptcy No. 18-16016JKF
	:	Chapter 13
	:	

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DEBTORS OBJECTIONS TO TRUSTEE'S MOTION TO DISMISS (2<sup>nd</sup> copy)

AND NOW, comes Debtor, Allen Windrim, and files the within Answer's and allege as follows:

1. Debtor, Allen Windrim, has mailed a response to the Trustees Amended Motion To Dismiss on the 28<sup>th</sup> January 2019, proof of mailing attached.
2. Debtor, is ProSe and is currently amending the previously submitted plan and respectfully requests a stay of all proceedings and requests time to amend the plan and file the same with the Honorable court.
3. Debtor, has concerns that the trustee had prepared and filed the Amended Motion To Dismiss prior to the scheduled, January 18<sup>th</sup>, 2019 first meeting of the creditors, not allowing Debtor an opportunity to discuss and understand any open concerns with the filed plan.
4. Debtor, had a successful meeting with attorney Polly Langdon, on the 18<sup>th</sup> January 2019, during the meeting of the creditors and was provided with a detailed list of deficiencies' with the filed plan and informed Ms. Langdon that an amended plan will be filed.
5. Debtor, has also meet with two additional, in addition to the three attorney's already met, to discuss legal representation; unfortunately, neither attorney will accept the case with payment, in full, up front. Debtor, is unable to afford the attorney's fees, at this present time, and is working on acquiring the funds to retain an attorney.
6. Debtor, is aware of the mistakes made in the filed plan and is currently amending the plan and anticipates to correct all noted deficiencies and the plan will also anticipate to satisfy all creditors.

WHEREFORE, Debtor, Allen Windrim, respectfully requests that this Honorable Court enter an Order in response to the Debtor's Motion for:

(1) A request of a continuance to file an amended plan;

- and -

(2) Not dismissing the Debtor's current case;

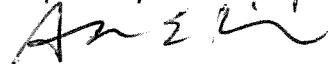
and

(3) Issuing a stay of all pending motion's in order to file responses, accordingly;

- and -

 Denying Trustee's Amended Motion To Dismiss Pursuant to 11 U.S.C. Section 1307

Respectfully Submitted:



/s/: Allen Windrim

Allen Windrim, Pro Se,  
Debtor

Dated: 28<sup>th</sup> January 2019

Dated: 4<sup>th</sup> February 2019 (2<sup>nd</sup> copy)

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ALLEN WINDRIM, Pro Se	:	UNITED STATES BANKRUPTCY COURT
Debtor	:	EASTERN DISTRICT OF PENNSYLVANIA
	:	
	:	
	:	Bankruptcy No. 18-16016JKF
	:	Chapter 13

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct 2<sup>nd</sup> copy of the foregoing Answer To Trustee's Amended Motion To Dismiss, were served on this 4<sup>th</sup> day of February, 2019, by hand delivery to the Courthouse and fax copy to the attorney for the trustee, upon those listed below:

(HAND DELIVERED 2<sup>ND</sup> COPY)

U.S. Bankruptcy Court

Clerk's Office

United States Courthouse

900 Market Street

Philadelphia, PA 19107

&

(FAXED 2<sup>ND</sup> COPY TO: 610-779-3637

Polly Langdon, Esq.

for William Miller, Esq.

Interim Chapter 13 Trustee

2901 St. Lawrence Avenue, Suite 100

Reading, PA 19606

/s/: Allen Windrim  
Allen Windrim, Pro Se,  
Debtor

Dated: 4<sup>th</sup> February 2019